



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 27, 2006

Rick Cooper
Hollister Field Office
Bureau of Land Management
20 Hamilton Court
Hollister, CA 95023

Subject: Final Resource Management Plan/Environmental Impact Statement (EIS)
for the Southern Diablo Mountain Range and Central Coast of California
[CEQ# 20060282]

Dear Mr. Cooper:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

In our January 11, 2006, comment letter on the Draft EIS, we recommended additional measures that should be taken to reduce impacts to human health, and watershed and vegetation resources. We commend BLM for including additional Management Actions in the Final EIS, particularly regarding naturally occurring asbestos and relocating roads out of riparian areas. The FEIS also indicates that BLM will strive to revegetate disturbed areas using local genotypes of native species where available, and to prioritize watershed improvement projects and establish monitoring programs. We recommend these measures be included as Management Actions and commitments in the Record of Decision (ROD). We remain concerned that grazing may put additional stresses on watershed and rangeland health even in allotments where grazing is not considered to be the cause of failure to meet the standards and guidelines (S&G). We recommend BLM strive to bring all allotments not meeting rangeland health S&G into compliance and that this be included as a commitment in the ROD. Our detailed comments are enclosed.

We appreciate the opportunity to review this Final EIS and request a copy of the ROD when it becomes available. If you have any questions, please call me at (415) 972-3988, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

/s/

Duane James, Manager
Environmental Review Office

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Enclosure

Final Resource Management Plan/Environmental Impact Statement (EIS) for the
Southern Diablo Mountain Range and Central Coast of California
EPA Comments – July, 2006

1. Under the Preferred Alternative, allotment management plans would be developed to bring allotments not meeting the Standards and Guidelines (S&G) due to livestock grazing into compliance. In our Draft EIS comment letter, we recommended the Preferred Alternative include a Management Action, such as RANG-B6, specifying that BLM will develop allotment management plans to bring *all* allotments not meeting rangeland health S&G into compliance, including those lands where grazing is not considered to be the cause of failure to meet the S&G. We continue to recommend this Management Action if grazing on these lands is putting additional stresses on the watershed and rangeland health. We recommend such a Management Action be included as a commitment in the ROD.

2. The Final EIS (Response 1.b. on page G-29) states that BLM would work cooperatively with Regional Water Quality Control Boards and others to prioritize watershed improvement projects and establish monitoring programs to prevent water bodies from reaching impairment levels that would result in listing under Clean Water Act Section 303(d). Water quality monitoring of streams helps to establish baselines, problem areas, and trends; determine whether properly functioning conditions are being met; limit activities to those that do not adversely affect water quality and watershed function; and identify necessary corrective measures. We were unable to find a Management Action in the Final EIS that includes water quality monitoring of streams commensurate with Final EIS Response 1.b. We recommend such a Management Action be included as a commitment in the ROD.

3. The Final EIS (Response 1.f. on page G-30) states that, after fires and other surface disturbances, BLM would place an emphasis on revegetation with local genotypes of native species if they are available at the time. In addition, BLM would consider follow-up restoration with native seeds and seedlings from local genotypes as they become available. We commend BLM's response to this issue but were unable to find it specified as a Management Action in the Final EIS. We recommend such a Management Action be included as a commitment in the ROD.